

## Plan of Correction

<b>Program Name:</b> Action for the Betterment of the Community (ABC)	<b>Date Submitted:</b> 11/1/2019	<b>Date Due:</b> 12/1/2019
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Administrative POC-1	
<b>Contract Attachment #1</b>	<p><b>Contract Attachment:</b> <b><u>Populations to be Served</u></b></p> <p>It is the intent of the Division of Behavioral Health to fund services in South Dakota for residents living in South Dakota. It is the Division's expectation that state funds be targeted to those citizens of South Dakota in need of substance use disorder and gambling treatment services.</p> <p><b>Priority Populations:</b> Target populations to be served under the contract, in order of priority for State and Federal funds paid to the agency, and in accordance with 45 CFR 96.124 and 45 CFR 96.131, are as follows:</p> <ol style="list-style-type: none"> <li>1) <b>Pregnant Women</b> <ol style="list-style-type: none"> <li>a) Agencies must ensure that each pregnant woman in the state who seeks or is referred for and would benefit from treatment is given preference in admissions to treatment facilities receiving block grant funds.</li> <li>b) The agency shall publicize by public service announcement or street outreach programs the availability to such women of these treatment services designed for pregnant women and women with dependent children.</li> <li>c) Services for pregnant women/women with dependent children must comply with the provisions set forth in 45 CFR Sec. 96.124.</li> <li>d) Pregnant Women who are also Intravenous Drug Users are the highest priority for services.</li> </ol> </li> <li>2) <b>Intravenous Drug Users</b> <ol style="list-style-type: none"> <li>a) The agency shall develop and implement a program of outreach services to identify individuals in need of treatment for their intravenous drug use and to encourage the individual to undergo treatment for such use.</li> <li>b) The agency shall maintain a record of outreach services provided to intravenous drug users.</li> <li>c) Services for intravenous drug users must comply with the provisions set forth in 45 CFR 96.124 and 45 CFR 96.131.</li> <li>d) The agency shall develop and implement a policy to ensure that they will not distribute sterile needles or distribute bleach for the purpose of cleaning needles and shall develop and implement a policy to ensure they will not carry out any testing for the acquired immune deficiency syndrome without appropriate pre- and post-test counseling.</li> </ol> </li> <li>3) <b>Adolescents</b></li> </ol>

<b>Limited English Proficiency Policy</b> <ol style="list-style-type: none"> <li>4) The agency shall develop and implement a Limited English Proficiency Policy (LEP), as a condition for funding under this contract agreement to ensure that LEP individuals are provided with an opportunity to participate in and understand all provided services.</li> <li>5) The means of effective communication may be through interpreters or the translation of written material as deemed necessary by the Agency.</li> </ol>	
<b>Area of Noncompliance:</b> The agency will publicize priority services for pregnant women, women with dependent children and IV users. The prioritized service needs to be documented. A policy for Limited English Proficient (LEP) needs to be put in place.	
<b>Corrective Action (policy/procedure, training, environmental changes, etc):</b> Policy implemented and 48 hour policy.	<b>Anticipated Date Achieved/Implemented:</b>  <b>Date</b> 10/22/2019 board approved
<b>Supporting Evidence:</b> Policy Attached	<b>Person Responsible:</b> Kara Graveman
<b>How Maintained:</b> yearly review at board meeting	<b>Board Notified:</b> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> n/a <input type="checkbox"/>

Client Chart POC-1	
<b>Rule #:</b> 67:61:07:08	<p><b>Rule Statement: Progress notes.</b> All programs, except prevention programs, shall record and maintain a minimum of one progress note weekly, when services are provided. Progress notes are included in the client's file and substantiate all services provided. Individual progress notes must document counseling sessions with the client, summarize significant events occurring, and reflect goals and problems relevant during the session and any progress in achieving those goals and addressing the problems. Progress notes must include attention to any co-occurring disorder as they relate to the client's substance use disorder.</p> <p>A progress note must be included in the file for each billable service provided. Progress notes must include the following for the services to be billed:</p> <ol style="list-style-type: none"> <li>1) Information identifying the client receiving the services, including the client's name and unique identification number;</li> <li>2) The date, location, time met, units of service of the counseling session, and the duration of the session;</li> <li>3) The service activity code or title describing the service code or both;</li> <li>4) A brief assessment of the client's functioning;</li> <li>5) A description of what occurred during the session, including the specific action taken or plan developed to address unresolved issues for the purpose of achieving identified treatment goals or objectives;</li> <li>6) A brief description of what the client and provider plan to work on during the next session, including work that may occur between sessions, if applicable; and</li> <li>7) The signature and credentials of the staff providing the service.</li> </ol>

<b>Area of Noncompliance:</b> The plan for next session in the progress notes at times appeared to be vague and similar throughout the chart. The plan for next session needs to be individualized to the client.	
<b>Corrective Action (policy/procedure, training, environmental changes, etc):</b> email to staff, regarding change in notes. Training was provided to staff on 10/30/2019	<b>Anticipated Date Achieved/Implemented:</b>  <b>Date</b> 10/30/2019
<b>Supporting Evidence:</b> N/A	<b>Person Responsible:</b> Kara Graveman
<b>How Maintained:</b> Check on notes for next month to maintain the changes that were trained	<b>Board Notified:</b> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> n/a <input type="checkbox"/>

Client Chart POC-2	
<b>Rule #:</b> 67:61:07:10	<b>Rule Statement: Transfer or discharge summary.</b> An addiction counselor or counselor trainee shall complete a transfer or discharge summary for any client within five working days after the client is discharged regardless of the reason for discharge. A transfer or discharge summary of the client's problems, course of treatment, and progress toward planned goals and objectives identified in the treatment plan is maintained in the client case record. A process shall be in place to ensure that the transfer or discharge is completed in the MIS.  When a client prematurely discontinues services, reasonable attempts shall be made and documented by the agency to re-engage the client into services if appropriate.
<b>Area of Noncompliance:</b> The transfer or discharge summary was not completed within the 5-day time frame.	
<b>Corrective Action (policy/procedure, training, environmental changes, etc):</b> Training provided to staff and worked to implement new QA policy to maintain records in a monthly fashion (we will QA all charts as we close them)	<b>Anticipated Date Achieved/Implemented:</b>  <b>Date</b> 10/30/2019
<b>Supporting Evidence:</b> N/A	<b>Person Responsible:</b> Kara Graveman
<b>How Maintained:</b> Training will document QA's in each file and will catch dates as they close	<b>Board Notified:</b> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> n/a <input type="checkbox"/>

 Program Director Signature: Kara Graveman	Date: 11/1/2019
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Please email or send Plan of Correction to:

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